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5 Attorneys for Defendant
SYLVIA SIMONSEN

6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF CALIFORNIA
8

9 UNITED STATES OF AMERICA,) No. 2:20-CR-0051-KJM
10 Plaintiff,)
11 v.) STIPULATION AND [~~PROPOSED~~] ORDER
TO MODIFY SPECIAL CONDITION OF
12 SYLVIA SIMONSEN,) RELEASE
13 Defendant.) Judge: Hon. Allison Claire
14)

15 IT IS HEREBY STIPULATED AND AGREED between plaintiff, United States of America,
16 and defendant SYLVIA SIMONSEN, through their respective attorneys that the release
17 conditions imposed on Ms. Simonsen on December 9, 2019 (Docket 25), will be modified to
18 remove Condition 12 and Condition 13 on March 11, 2020.

19 12. You must participate in the following location monitoring program component
20 and abide by all the requirements of the program, which will include having a
21 location monitoring unit installed in your residence and a radio frequency
22 transmitter device attached to your person. You must comply with all instructions
23 for the use and operation of said devices as given to you by the Pretrial Services
24 Agency and employees of the monitoring company. You must pay all or part of
the costs of the program based upon your ability to pay, as determined by the
pretrial services officer;

25 13. **CURFEW:** You must remain inside your residence every day from 5:00pm to
26 8:00am, or as adjusted by the pretrial services officer for medical, religious
27 services, employment or court-ordered obligations;
28

1 Ms. Simonsen is scheduled to waive indictment on March 11, 2020 and proceed on an
2 Information charging her with 18 U.S.C. §1519, which is not an Adam Walsh offense. The
3 proposed modification is supported by her Pretrial Services Officer and the government.

4 All other conditions shall remain in force.

5 DATED: March 6, 2020

HEATHER E. WILLIAMS
Federal Defender

7 /s/ Noa E. Oren
8 NOA E. OREN
9 Assistant Federal Defender
Attorney for SYLVIA SIMONSEN

10 DATED: March 6, 2020

McGREGOR SCOTT
United States Attorney

12 /s/ James Conolly
13 JAMES CONOLLY
14 Assistant U.S. Attorney
15 Attorney for Plaintiff
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ORDER

The following release conditions imposed on Ms. Simonsen on December 9, 2019 (Docket 25), will be modified to remove Condition 12 and Condition 13 on March 11, 2020.

12. You must participate in the following location monitoring program component and abide by all the requirements of the program, which will include having a location monitoring unit installed in your residence and a radio frequency transmitter device attached to your person. You must comply with all instructions for the use and operation of said devices as given to you by the Pretrial Services Agency and employees of the monitoring company. You must pay all or part of the costs of the program based upon your ability to pay, as determined by the pretrial services officer;
14. **CURFEW:** You must remain inside your residence every day from 5:00pm to 8:00am, or as adjusted by the pretrial services officer for medical, religious services, employment or court-ordered obligations;

All other conditions shall remain in force.

DATED: March 6, 2020


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE